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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

22 ALEX MORGAN, et al.,

23 Plaintiffs/Claimants,

24 v.

25 UNITED STATES SOCCER  
26 FEDERATION, INC.,

27 Defendant/Respondent.

**Case No. 2:19-cv-01717-RGK-AGR**

Assigned to: Judge R. Gary Klausner

**DECLARATION OF REBECCA ROUX  
IN SUPPORT OF PLAINTIFFS' REPLY  
IN SUPPORT OF MOTION FOR  
CLASS CERTIFICATION**

Date: October 21, 2019

Time: 9:00 A.M.

Place: Courtroom 850

1 I, Rebecca Roux, declare as follows:

2 1. I am over the age of 18. If called upon to testify, I could and would  
3 competently testify to the matters set forth in this declaration.

4 2. I am the Executive Director of the United States Women's National Team  
5 Players Association ("WNTPA"). In this role, I represent members of the United States  
6 Senior Women's National Soccer Team ("WNT") in collective bargaining agreement  
7 negotiations and enforcement of the collective bargaining agreement with the players'  
8 employer, the United States Soccer Federation, Inc. ("USSF"). I am familiar with terms  
9 of the Memorandum of Understanding between USSF and the WNTPA, effective  
10 March 19, 2013 through December 31, 2016 ("WNT MOU") and the Collective  
11 Bargaining Agreement between USSF and the WNTPA, effective January 1, 2017  
12 through December 31, 2021 ("WNT CBA"). I am also familiar with the terms of the  
13 2011–2018 Collective Bargaining Agreement between the USSF and the United States  
14 National Soccer Team Players Association ("MNT CBA").

15 3. Based on my review of the publicly available schedules and results of the  
16 WNT and MNT, the WNT and MNT plays more games and wins more frequently. For  
17 example, from January 1, 2017 through October 7, 2019, the WNT played 14 more  
18 games than the MNT and won 83% of their games while the MNT won 48% of their  
19 games. The WNT amassed a 48 win, 4 loss, and 6 draw record for this period, while  
20 the MNT held a 21 win, 11 loss, and 12 draw record over the same stretch. The WNT  
21 played 46 friendlies, 5 World Cup qualifiers, and 7 World Cup games for a total of 58  
22 matches, while the MNT played 30 friendlies, 14 World Cup qualifiers, and 0 World  
23 Cup games for a total of 44 matches.


24 4. In the course of my work as the Executive Director of WNTPA, I regularly  
25 track the WNT's schedules, game results, and the FIFA rank of the WNT's opponents.  
26 Applying those factors to my understanding of how the MNT CBA operates and, in  
27 particular, how MNT players are compensated based on the games that they play, I have  
28 compared how much players on the WNT would have earned from March 30, 2014

through October 7, 2019 had those players' compensation been governed by the MNT CBA. For this period, the following chart shows my calculation of the total compensation that Alex Morgan, Megan Rapinoe, Carli Lloyd, and Becky Sauerbrunn each earned under the WNT MOU and WNT CBA.

<b>Comparison of WNT Players' Pay Under WNT Rate Versus Under MNT Rate from March 30, 2014 Through October 7, 2019</b>		
<b>Player</b>	<b>Pay Under WNT Rate</b>	<b>Pay Under MNT Rate</b>
Alex Morgan	\$ 1,201,449.64	\$ 4,104,920.65
Megan Rapinoe	\$ 1,159,099.64	\$ 3,722,625.00
Carli Lloyd	\$ 1,204,049.64	\$ 4,168,420.65
Becky Sauerbrunn	\$ 1,188,249.64	\$ 4,172,670.65

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of October 2019.

  
 \_\_\_\_\_  
 Rebecca Roux